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5 Attorneys for Defendant BIO-
ENGINEERED SUPPLEMENTS AND
6 NUTRITION, INC.

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 THERMOLIFE INTERNATIONAL,
12 LLC

13 Plaintiff,

14 v.

15 BETTER BODY SPORTS, LLC, et al,
16 Defendants.

CASE NO. CV12-09229 GAF (FFM_x)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN
30 DAYS (L.R. 8-3)**

Complaint served: November 13, 2012
Current response date: December 4, 2012
New response date: January 3, 2013

Action filed: October 26, 2012
Trial Date: None set

VENABLE LLP
2049 CENTURY PARK EAST, SUITE 2100
LOS ANGELES, CA 90067
310-229-9900

1 WHEREAS, Plaintiff filed its complaint on October 26, 2012;
2 WHEREAS, Defendant Bio-Engineered Supplements and Nutrition, Inc.
3 (“BSN” or “Defendant”) was served with the Summons and Complaint on
4 November 13, 2012;

5 WHEREAS, BSN’s response to the Complaint is due on December 4, 2012;

6 WHEREAS, BSN’s counsel has requested, and Plaintiff’s counsel has
7 agreed to, a 30-day extension until January 3, 2013 for BSN to respond to the
8 Complaint;

9 WHEREAS, BSN submits that good cause exists for the extension because
10 BSN just recently retained undersigned counsel, and undersigned counsel requires
11 additional time to evaluate and investigate the allegations and claims set forth in
12 the Complaint;

13 WHEREAS, the Court has not established a discovery cutoff date, last date
14 for hearing motions, a pre-trial conference date, or trial date;

15 WHEREAS, BSN submits that no party will be prejudiced by the relief
16 sought and Plaintiff agrees to the requested extension;

17 WHEREAS, trial will not be delayed because the Court has not set any trial
18 date or other deadline in this case;

19 WHEREAS, no party has requested any extension of any deadline in this
20 action.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that BSN's
2 deadline to respond to the Complaint is extended to January 3, 2013. BSN lodges
3 herewith a proposed order for the Court's consideration.
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5 Dated: November 28, 2012

VENABLE LLP

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7 By: /s/ Daniel S. Silverman
8 Daniel S. Silverman
9 Attorneys for Defendant
10 Bio-Engineered Supplements and
11 Nutrition, Inc.
12

13 Dated: November 28, 2012

NEWPORT TRIAL GROUP

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15 By: /s/ Scott Ferrell
16 Scott Ferrell
17 Attorneys for Plaintiff
18 Thermolife International, LLC
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